

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JUSTIN A. LANG and	:	
JAMIE L. LANG,	:	
Debtors	:	
	:	Bankruptcy No. 1:20-bk-02360-HWV
M&T BANK,	:	
Movant	:	
v.	:	
	:	
JUSTIN A. LANG and	:	
JAMIE L. LANG,	:	
Debtors	:	
	:	
HEATHER LANG,	:	
Co-Debtor	:	
	:	
CHARLES J. DEHART III,	:	
Chapter 13 Trustee	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR RELIEF**

AND NOW COMES, Debtors, Justin A. Lang and Jamie L. Lang, by and through their attorneys, Upright Law, LLC, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. It is admitted the Debtors are behind on payments to Movant. Debtors are willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. Debtors have been impacted by the Covid-19 Pandemic.

7. It is admitted the Debtors are behind on payments to Movant. Debtors are willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. Debtors have been impacted by the Covid-19 Pandemic.

8. Paragraph 8 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

9. Paragraph 9 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

10. Paragraph 10 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further request any other relief deemed necessary and just.

Respectfully Submitted,

UPRIGHT LAW, LLC

Dated: January 20, 2021

/s/Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JUSTIN A. LANG and	:	
JAMIE L. LANG,	:	
Debtors	:	
	:	Bankruptcy No. 1:20-bk-02360-HWV
M&T BANK,	:	
Movant	:	
v.	:	
	:	
JUSTIN A. LANG and	:	
JAMIE L. LANG,	:	
Debtors	:	
	:	
HEATHER LANG,	:	
Co-Debtor	:	
	:	
CHARLES J. DEHART III,	:	
Chapter 13 Trustee	:	

CERTIFICATE OF SERVICE

I, Dera Shade, of Upright Law, LLC, do hereby certify that on this day I served the within **Respondent's Answer to Movant's Motion for Relief from The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) PO Box 7005 Lancaster, PA 17604	Rebecca A. Solarz, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532
United States Trustee Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

/s/ Dera Shade
8150 Derry Street
Harrisburg, PA 17111
717.909.5858
FAX: 717.909.7788
Email: dshade@ljacobsonlaw.com

Dated: January 20, 2021